

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
	:	18 Civ. 8175 (ER)
– against –	:	
	:	ECF CASE
BARRY C. HONIG, MICHAEL BRAUSER,	:	
JOHN STETSON, JOHN R. O’ROURKE III,	:	
ROBERT LADD, ELLIOT MAZA, BRIAN KELLER,	:	
JOHN H. FORD, ATG CAPITAL LLC, GRQ	:	
CONSULTANTS, INC., HS CONTRARIAN	:	
INVESTMENTS, LLC, GRANDER HOLDINGS, INC.,	:	
and STETSON CAPITAL INVESTMENTS INC.,	:	
	:	
Defendants.	:	
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STIPULATION AND [PROPOSED] ORDER

WHEREAS, pursuant to the Court’s Amended Opinion and Order, entered February 25, 2020 (DE 212), Plaintiff Securities and Exchange Commission (the “Commission”) is to serve and file its Second Amended Complaint by March 16, 2020;

WHEREAS, the Commission wishes to further amend its Complaint to add new charges against Defendant Ladd;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, Securities and Exchange Commission (“Commission”), and Defendant Ladd, through their respective attorneys:

1. Defendant Ladd consents to the filing of the Commission’s Second Amended Complaint, including the new charges against Defendant Ladd, by March 16, 2020; and
2. Defendant Ladd shall move, answer or otherwise respond to the Second Amended Complaint by April 30, 2020.

